

**Our File No.: 49269**  
MORTON & CRAIG, LLC  
110 Marter Avenue  
Suite 301  
Moorestown, NJ 08057  
(856)866-0100  
Attorney for Ford Motor Credit Company LLC  
JM5630 \_\_\_\_\_

IN RE:

JOHN P. CONKLIN  
MELISSA A. CONKLIN

UNITED STATES  
BANKRUPTCY COURT FOR  
THE DISTRICT OF NEW  
JERSEY

CHAPTER 13  
CASE NO: 17-36011(KCF)  
HEARING DATE: 8-6-2019

NOTICE OF MOTION OF  
FORD MOTOR CREDIT  
COMPANY LLC TO MODIFY  
THE AUTOMATIC STAY

To:

John and Melissa Conklin  
63 Guilford Place  
Burlington, NJ 08016  
Debtor

Brad J. Sadek, Esq.  
1315 Walnut Street  
Suite 502  
Philadelphia, PA 19107  
Attorney for the debtor

Albert Russo  
Standing Chapter 13 Trustee  
CN 4853  
Trenton, NJ 08650-4853  
Trustee

U.S. Trustee, US Dept of Justice  
Office of the US Trustee  
One Newark Center, Suite 2100  
Newark, NJ 07102

John R. Morton, Jr., Esquire, attorney for Ford Motor Credit Company LLC, has filed papers with the Court for relief from the automatic stay to permit Ford Motor Credit Company LLC to repossess and sell the motor vehicle(s) described in the attached pleadings. **Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult with one.** If you do not want the Court to grant the relief sought, or if you want the Court to consider your views on the motion, then no later than seven (7) days before the hearing date, you or your attorney must:

File with the Court a written request for a hearing (or, if the Court requires a written response, an answer, explaining your position) at:

United States Bankruptcy Court  
402 E. State Street  
Trenton, NJ 08608

If you mail your (request) (response) to the Court for filing, you must mail it early enough so the Court will receive it on or before the date stated above.

You must also mail a copy to:

John R. Morton, Jr., Esquire  
110 Marter Avenue, Suite 301  
Moorestown, NJ 08057

TAKE FURTHER NOTICE that the facts movant relies upon, as set forth on the accompanying certification, and the basis for relief from the automatic stay, do not present complicated questions of fact or unique questions of law, it is hereby submitted that no brief is necessary in the Court's consideration of the within Motion, and TAKE FURTHER NOTICE that oral argument is hereby not requested.

**Attend the hearing scheduled to be held on August 6, 2019 at 9 a.m. in Courtroom #8, United States Bankruptcy Court, 402 E. State Street, Trenton, New Jersey 08608.**

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the motion and may enter an order.

Date: 7-10-2019

/s/ John R. Morton, Jr.  
John R. Morton, Jr., Esquire  
Attorney for Ford Motor Credit  
Company LLC